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8	Volkswagen Group of America, Inc.				
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10					
11	UNITED STATES DISTRICT COURT				
12	NORTHERN DISTRICT OF CALIFORNIA				
13	SAN FRANCISCO DIVISION				
14	IN RE: VOLKSWAGEN "CLEAN DIESEL")) MDL No. 2672 CRB (JSC)			
15	MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION)) JOINT STIPULATION AND			
16) [PROPOSED] ORDER REGARDING) AWARD OF ATTORNEYS' FEES,			
17	This Document Relates to:	COSTS AND EXPENSES			
18	Clendenen v. Volkswagen, No. 18-cv-7040) The Honorable Charles R. Breyer			
19	Coon v. Volkswagen, No. 18-cv-6966)			
	Ortiz v. Volkswagen, No. 18-cv-6951)			
20	Riley v. Volkswagen, No. 17-cv-2897)			
21	Robertson v. Volkswagen, No. 18-cv-6956)			
22	Salzer v. Volkswagen, No. 18-cv-7050 Sanwick v. Volkswagen, No. 17-cv-3032				
23	Sammen 1. Foliamagen, 110. 17 CV 3032)			
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SULLIVAN
&
CROMWELL LLP

This Stipulation is entered into by and among the plaintiffs in the above-captioned actions ("Plaintiffs") and Defendants Volkswagen AG and Volkswagen Group of America, Inc. ("Volkswagen"; together with the Plaintiffs, the "Parties").

WHEREAS, on March 20, 2023, five law firms—the Knight Law Group LLP ("Knight Law"), Glaser Weil Fink Howard Jordan & Shapiro LLP ("Glaser Weil"), the Center For Constitutional Litigation ("CCL"), the Auto Fraud Legal Center ("AFLC"), and Greines, Martin, Stein & Richland, LLP ("GMSR," together "Plaintiffs' Counsel")—filed motions for attorneys' fees (ECF Nos. 8140, 8141, and 8143) and for other costs (ECF No. 8142; together, the "Motions") on behalf of Plaintiffs;

WHEREAS, on June 21, 2023, following briefing, the Court issued an Order Awarding Fees and Costs (ECF No. 8181; the "Order"), in which the Court held that certain fees and costs were recoverable and that certain fees and costs were not recoverable; and

WHEREAS, in the Order, the Court directed the Parties to file a joint proposed order with stipulated awards for each firm consistent with the Court's Order.

NOW, THEREFORE, IT IS HEREBY STIPULATED, by and among the Parties, through their undersigned counsel, and subject to the approval of the Court, that the total awards for each Plaintiffs' Counsel are as follows:

Plaintiffs' Counsel	Fee Award	Cost Award
Knight Law	\$15,955.48	\$15,458.05
Glaser Weil	\$2,834.90	None
CCL	\$782.23	None
AFLC	\$4,755.49	None
GMSR	\$28,730.55	None

IT IS SO STIPULATED.

1	Dated:	July 5, 2023	Respectfully submitted,
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3			/s/ Robert J. Giuffra, Jr. Robert J. Giuffra, Jr. (admitted pro hac vice)
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			IOINT STIDLILATION AND [PROPOSED] ORDER

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SULLIVAN & CROMWELL LLP